

DRAFT

WISCONSIN STATE PLAN AND APPLICATION

For Administration of the

COMMUNITY SERVICES BLOCK GRANT

FFY 2012

Prepared by the Section of Program Operations
Bureau of Working Families
Division of Family and Economic Security
Wisconsin Department Children and Families
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I. Federal Fiscal Year or Years Covered by this State Plan and Application

Federal Fiscal Year (FFY) 2012 only

II. Letter of Transmittal

(See enclosed cover letter to the Office of Community Services Director.)

III. Executive Summary

This document is the State of Wisconsin's plan for allocation of Federal Fiscal Year (FFY) 2012 funding under the Community Services Block Grant (CSBG), a program re-authorized under the Coats Human Services Reauthorization Act of 1998. This plan is administered by the Wisconsin Department of Children and Families (DCF), Division of Family and Economic Security, Bureau of Working Families, Program Operations Section, and was developed with input from citizens including low-income persons, staff and volunteers of human services agencies and provider groups, tribal members and elected and appointed officials.

The purpose of CSBG is to empower people and communities to overcome the effects of poverty and to support their progress toward greater self-sufficiency. Towards this goal, 86.0 percent of Wisconsin's total estimated allocation of \$8,466,369.00 for Federal Fiscal Year (FFY) 2012 will be distributed by formula to sixteen Community Action Agencies (CAAs), and 4.0 percent will be allocated to a statewide agency serving immigrants, refugees and migrant farm workers (United Migrant Opportunity Services [UMOS]). Each of CAAs is a not-for-profit corporation or social development commission that provides direct services to low-income individuals, families and communities within a specific geographic area. Direct services provided by these agencies include employment training, housing assistance, small business development, transportation assistance, affordable housing development, parenting and family support, emergency food and clothing, and special projects for child and youth development. Each organization conducts a comprehensive needs assessment within its service area and tailors its programs and services to meet those identified needs. Programming for the 2012 FFY is based upon needs determined during the 2010 tri-annual needs assessment. Each CAA is governed by its own tripartite board of directors consisting of a minimum of one-third representatives of the poor in the geographic area served, one-third elected public officials or their designees from that area, and one-third representatives representing public and private institutions that serve the CAAs' communities.

In addition to funding the 16 CAAs and UMOS, Wisconsin also allocates 4.0 percent of CSBG funding to the State's 11 federally-recognized Indian tribes. 1.8 percent is designated for funding of two Limited Purpose Agencies (LPAs), each of which has a specific constituency and provides direct services to individuals, families and communities. LPAs are governed by boards of directors that have membership comprised of at least 50 percent low-income individuals or persons who can effectively represent the needs and interests of low-income citizens.

Finally, the State of Wisconsin utilizes 4.2 percent of total funding as administrative dollars within the Department for the purpose of administering the CSBG program statewide, and to support the work of the Wisconsin Community Action Program Association (WISCAP), a membership organization that provides technical assistance, training and support to agencies receiving CSBG funds. The CSBG Grant Specialist works closely with WISCAP leadership and membership on initiatives and strategies that further Community Action goals and objectives.

As authorized, not less than 90 percent of the CSBG funds made available to the State of Wisconsin are used to make grants for the purposes of the CSBG subtitle. Distribution of these CSBG funds among CAAs is calculated on a per capita basis, multiplying the total Wisconsin CSBG grant allocation times approximately 86.0 percent, and then dividing that sum by the number of persons living within each respective agency service area whose incomes are at or below 100 percent of the federal poverty level (as shown by 2010 census data).

The distribution formula for CSBG funds allocated to Wisconsin is:

- CAAs – 86%

- Tribal governments - 4%
- United Migrant Opportunity Services (UMOS) – 4%
- Limited Purpose Agencies – 1.8%
- State Administration and WISCAP – 4.2%

A. CSBG State Legislation

Wisconsin State Statutes, Chapter 49, sections 49.265(1) thru 49.265(6) describe Community Action Agencies (CAAs) and Limited Purpose Agencies (LPAs), and the powers and duties to be carried out by these agencies under Wisconsin's statutory authority for the Community Services Block Grant program. Wisconsin's CSBG funding received under 42 USC 9903 is appropriated under Wisconsin Statutes sections 49.265(4) and 20.437(2)(mg) (federal block grant operations and aids). Wisconsin Statutes s. 49.265(6) requires the Department to provide an annual report to the legislature concerning the activities of the CAAs and their effectiveness in promoting social and economic opportunities for poor persons.

B. Designation of Lead State Agency to Administer the CSBG Program

As required by Section 676(a) of the Act, the Chief Executive of Wisconsin, i.e. the Wisconsin governor, designates the Wisconsin Department of Children and Families to act as Wisconsin's lead agency for administration of the CSBG. (Please see the attached letter from the Governor of the State of Wisconsin designating the Department as the single state agency responsible for administering the CSBG and complying with all certifications and assurances required by the CSBG.)

Designated State Lead Agency: Wisconsin Department of Children and Families

Director/Administrator of Designated State Agency: Eloise Anderson, Secretary, Department of Children and Families

C. Public Hearing Requirements

The following describes Wisconsin's compliance with legislative hearing requirements of the CSBG Act regarding the State Plan and Application:

(1) Public Hearing:

The Wisconsin Department of Children and Families held a public hearing on July 25, 2011 for input on the FFY 2012 State Plan. As required by Section 676(a)(2)(B) of the CSBG Act, the Department distributed the notice of the public hearing statewide, including distribution of the notice to the Community Action Agencies, Limited Purpose Agencies, statewide community action association, Wisconsin's two largest newspapers, statewide report that summarizes news about State government, legislature and administrative offices in the Wisconsin State Capitol, and in the Department. (Please see attached required Open Meeting Notice for the public hearing and submitted testimony.)

(2) Legislative Hearing:

As required by Section 676(a)(3) of the CSBG Act, on August 19, 2009, the Wisconsin Senate Committee on Children, Families and Workforce Development held a legislative hearing in conjunction with the development of the State Plan to gain public input on and provide for a review of Community Services Block grant programming and plan. A Wisconsin legislative hearing on CSBG funds is held once every three years as required by State and Federal legislation.

(3) Public Inspection of the State Plan:

As required by Section 676(e)(2) of the CSBG Act, the Department made the State Plan available for public inspection and comment. The Department distributed the FFY 2012 State Plan via e-mail to the Community Action Agencies (CAAs), Limited Purpose Agencies (LPAs) and Wisconsin's statewide community action association (WISCAP). In addition, public inspection of the plan was made available through notice of the public hearing to those entities and also Wisconsin's two largest newspapers, statewide report that summarizes news about

State government, legislature and administrative offices in the State Capitol, and in the Department. Copies of the plan were also available at the hearing or by request. (Please see attached written comments on the plan.)

IV. Statement of Federal and CSBG Assurances

By signature at the end of this section, the Secretary of the Wisconsin Department of Children and Families, designated by the chief executive of the State, hereby agrees to the Assurances required by Section 676 of the Community Services Block Grant Act, as amended, (42 U.S.C. 9901 et seq.) for the FFY 2012 CSBG Wisconsin Application and Plan.

A. Programmatic Assurances

- (1) Funds made available through this grant or allotment will be used:
 - (a) To support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), homeless families and individuals, migrant or seasonal farm workers, and elderly low-income individuals and families to enable the families and individuals to:
 - (i) remove obstacles and solve problems that block the achievement of self-sufficiency (including self-sufficiency for families and individuals who are attempting to transition off a State program carried out under part A of Title IV of the Social Security Act);
 - (ii) secure and retain meaningful employment;
 - (iii) attain an adequate education, with particular attention toward improving literacy skills of low-income families in the communities involved, which may include carrying out family literacy initiatives;
 - (iv) make better use of available income;
 - (v) obtain and maintain adequate housing and a suitable living environment;
 - (vi) obtain emergency assistance through loans, grants, or other means to meet immediate and urgent family and individual needs; and
 - (vii) achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts;
 - (b) To address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth, and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing youth crime, such as programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and after-school child care programs; and
 - (c) To make more effective use of, and to coordinate with, other programs (including State welfare reform efforts). [676(b)(1)]
- (2) To describe how the State intends to use discretionary funds made available from the remainder of the grant or allotment described in Section 675C(b) of the Act in accordance

with the Community Services Block Grant program, including a description of how the State will support innovative community and neighborhood-based initiatives related to the purposes of the Community Services Block Grant program; [676(b)(2)]

- (3) To provide information provided by eligible entities in the State, including:
 - (a) a description of the service delivery system, for services provided or coordinated with funds made available through grants made under Section 675C(a) of the Act, targeted to low-income individuals and families in communities within the State;
 - (b) a description of how linkages will be developed to fill identified gaps in services, through the provision of information, referrals, case management, and follow-up consultations;
 - (c) a description of how funds made available through grants made under Section 675(a) will be coordinated with other public and private resources; and,
 - (d) a description of how local entities will use the funds to support innovative community and neighborhood-based initiatives related to the purposes of the Community Services Block Grant, which may include fatherhood initiatives and other initiatives with the goal of strengthening families and encouraging effective parenting. [676(b)(3)]
- (4) To ensure that eligible entities in the State will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals.[676(b)(4)]
- (5) That the State and the eligible entities in the State will coordinate, and establish linkages between, governmental and other social services programs to assure the effective delivery of such services to low-income individuals and to avoid duplication of such services, and State and the eligible entities will coordinate the provision of employment and training activities in the State and in communities with entities providing activities through statewide and local workforce investment systems under the Workforce Investment Act of 1998; [676(b)(5)]
- (6) To ensure coordination between antipoverty programs in each community in the State, and ensure, where appropriate, that emergency energy crisis intervention programs under Title XXVI (relating to low-income home energy assistance) are conducted in such communities.[676(b)(6)]
- (7) To permit and cooperate with Federal investigations undertaken in accordance with Section 678D of the Act. [676(b)(7)]
- (8) That any eligible entity in the State that received funding in the previous fiscal year through a Community Services Block Grant under the Community Services Block Grant program will not have its funding terminated under this subtitle, or reduced below the proportional share of funding the entity received in the previous fiscal year unless, after providing notice and an opportunity for a hearing on the record, the State determines that cause exists for such termination or such reduction, subject to review by the Secretary as provided in Section 678C(b) of the Act.[676(b)(8)]
- (9) That the State and eligible entities in the State will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups, and community organizations. [676(b)(9)]
- (10) To require each eligible entity in the State to establish procedures under which a low-income individual, community organization, or religious organization, or representative of low-income individuals that considers its organization, or low-income individuals, to be inadequately represented on the board (or other mechanism) of the eligible entity to petition for adequate representation. [676(b)(10)]
- (11) To secure from each eligible entity in the State, as a condition to receipt of funding, a

community action plan *(which shall be submitted to the Secretary, at the request of the Secretary, with the State plan)* that includes a community needs assessment for the community served, which may be coordinated with community needs assessments conducted for other programs; [676(b)(11)]

- (12) That the State and all eligible entities in the State will, not later than fiscal year 2001, participate in the Results Oriented Management and Accountability System, another performance measure system for which the Secretary facilitated development pursuant to Section 678E(b) of the Act .[676(b)(12)]
- (13) To provide information describing how the State will carry out these assurances.
[676(b)(13)]
(Please see V. The Narrative State Plan: Wisconsin's FFY 2012 Community Services Block Grant [CSBG] Plan.)

B. Administrative and Financial Assurances

The State further agrees to the following, as required under the Act:

- (1) To submit an application to the Secretary containing information and provisions that describe the programs for which assistance is sought under the Community Services Block Grant program prepared in accordance with and containing the information described in Section 676 of the Act. [675A(b)]
- (2) To use not less than 90 percent of the funds made available to the State by the Secretary under Section 675A or 675B of the Act to make grants to eligible entities for the stated purposes of the Community Services Block Grant program and to make such funds available to eligible entities for obligation during the fiscal year and the succeeding fiscal year, subject to the provisions regarding recapture and redistribution of unobligated funds outlined below. [675C(a)(1) and (2)]
- (3) In the event that the State elects to recapture and redistribute funds to an eligible entity through a grant made under Section 675C(a)(1) when unobligated funds exceed 20 percent of the amount so distributed to such eligible entity for such fiscal year, the State agrees to redistribute recaptured funds to an eligible entity, or require the original recipient of the funds to redistribute the funds to a private, nonprofit organization, located within the community served by the original recipient of the funds, for activities consistent with the purposes of the Community Services Block Grant program. [675C (a)(3)]
- (4) To spend no more than the greater of \$55,000 or 5 percent of its grant received under Section 675A or the State allotment received under section 675B for administrative expenses, including monitoring activities. [675C(b)(2)]
- (5) In states with a charity tax credit in effect under state law, the State agrees to comply with the requirements and limitations specified in Section 675(c) regarding use of funds for statewide activities to provide charity tax credits to qualified charities whose predominant activity is the provision of direct services within the United States to individuals and families whose annual incomes generally do not exceed 185 percent of the poverty line in order to prevent or alleviate poverty among such individuals and families. [675(c)]
- (6) That the lead agency will hold at least one hearing in the State with sufficient time and statewide distribution of notice of such hearing, to provide to the public an opportunity to comment on the proposed use and distribution of funds to be provided through the grant or allotment under Section 675A or '675B for the period covered by the State plan.
[676(a)(2)(B)]
- (7) That the chief executive officer of the State will designate, an appropriate State agency for purposes of carrying out State Community Services Block Grant program activities.
[676(a)(1)]
- (8) To hold as least one legislative hearing every three years in conjunction with the development of the State plan.[676(a)(3)]

- (9) To make available for the public inspection each plan or revised State plan in such a manner as will facilitate review of and comment on the plan. [‘676(e)(2)]
- (10) To conduct the following reviews of eligible entities:
 - (a) full onsite review of each such entity at least once during each three-year period;
 - (b) an onsite review of each newly designated entity immediately after the completion of the first year in which such entity receives funds through the Community Services Block Grant program;
 - (c) follow-up reviews including prompt return visits to eligible entities, and their programs, that fail to meet the goals, standards, and requirements established by the State;
 - (d) other reviews as appropriate, including reviews of entities with programs that have had other Federal, State or local grants (other than assistance provided under the Community Services Block Grant program) terminated for cause. [‘678B(a)]
- (11) In the event that the State determines that an eligible entity fails to comply with the terms of an agreement or the State plan, to provide services under the Community Services Block Grant program or to meet appropriate standards, goals, and other requirements established by the State (including performance objectives), the State will comply with the requirements outlined in Section 678C of the Act, to:
 - (a) inform the entity of the deficiency to be corrected;
 - (b) require the entity to correct the deficiency;
 - (c) offer training and technical assistance as appropriate to help correct the deficiency, and submit to the Secretary a report describing the training and technical assistance offered or stating the reasons for determining that training and technical assistance are not appropriate;
 - (d) at the discretion of the State, offer the eligible entity an opportunity to develop and implement, within 60 days after being informed of the deficiency, a quality improvement plan and to either approve the proposed plan or specify reasons why the proposed plan cannot be approved;
 - (e) after providing adequate notice and an opportunity for a hearing, initiate proceedings to terminate the designation of or reduce the funding to the eligible entity unless the entity corrects the deficiency. [‘678(C)(a)]
- (12) To establish fiscal controls, procedures, audits and inspections, as required under Sections 678D(a)(1) and 678D(a)(2) of the Act.
- (13) To repay to the United States amounts found not to have been expended in accordance with the Act, or the Secretary may offset such amounts against any other amount to which the State is or may become entitled under the Community Services Block Grant program. [‘678D(a)(3)]
- (14) To participate, by October 1, 2001, and ensure that all-eligible entities in the State participate in the Results-Oriented Management and Accountability (ROMA) System [‘678E(a)(1)].
- (15) To prepare and submit to the Secretary an annual report on the measured performance of the State and its eligible entities, as described under ‘678E(a)(2) of the Act.
- (16) To comply with the prohibition against use of Community Services Block Grant funds for the purchase or improvement of land, or the purchase, construction, or permanent improvement (other than low-cost residential weatherization or other energy-related home repairs) of any building or other facility, as described in Section 678F(a) of the Act.
- (17) To ensure that programs assisted by Community Services Block Grant funds shall not be carried out in a manner involving the use of program funds, the provision of services, or the employment or assignment of personnel in a manner supporting or resulting in the identification of such programs with any partisan or nonpartisan political activity or any political activity associated with a candidate, or contending faction or group, in an election

for public or party office; any activity to provide voters or prospective voters with transportation to the polls or similar assistance with any such election, or any voter registration activity. [678F(b)]

- (18) To ensure that no person shall, on the basis of race, color, national origin or sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity funded in whole or in part with Community Services Block Grant program funds. Any prohibition against discrimination on the basis of age under the Age Discrimination Act of 1975 (42 U.S.C. 6101 et seq.) or with respect to an otherwise qualified individual with a disability as provided in Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 12131 et seq.) shall also apply to any such program or activity. [678F(c)]
- (19) To consider religious organizations on the same basis as other non-governmental organizations to provide assistance under the program so long as the program is implemented in a manner consistent with the Establishment Clause of the first amendment to the Constitution; not to discriminate against an organization that provides assistance under, or applies to provide assistance under the Community Services Block Grant program on the basis that the organization has a religious character; and not to require a religious organization to alter its form of internal government except as provided under Section 678B or to remove religious art, icons, scripture or other symbols in order to provide assistance under the Community Services Block Grant program. [679]

C. Other Administrative Certifications

The State also certifies the following:

- (1) To provide assurances that cost and accounting standards of the Office of Management and Budget (OMB Circular A-110 and A-122) shall apply to a recipient of Community Services Block Grant program funds.
- (2) To comply with the requirements of Public Law 103-227, Part C Environmental Tobacco Smoke, also known as the Pro-Children Act of 1994, which requires that smoking not be permitted in any portion of any indoor facility owned or leased or contracted for by an entity and used routinely or regularly for the provision of health, day care, education, or library services to children under the age of 18 if the services are funded by a Federal grant, contract, loan or loan guarantee. The State further agrees that it will require the language of this certification be included in any sub-awards, which contain provisions for children's services and that all sub-grantees shall certify accordingly.

Eloise Anderson, Secretary, Wisconsin Department of Children and Families

Date

Wisconsin Department of Children and Families

Designated Lead Agency

V. The Narrative State Plan: Wisconsin's FFY 2012 Community Services Block Grant (CSBG) Plan

A. Administrative Structure

(1) State Administrative Agency

(a) Mission and Responsibilities

The **Wisconsin Department of Children and Families** combines more than 30 programs formerly housed primarily in the Department of Health and Family Services and the Department of Workforce Development. The Department of Children and Families includes:

- Child Protective Services
- Milwaukee Child Welfare
- Domestic violence response
- Child Support
- Child Care Regulation and Licensing
- Child Care Subsidy
- Refugee and Immigrant Integration
- Special Needs Adoption
- Foster Care
- Kinship Care
- Temporary Assistance for Needy Families (TANF)

The Community Services Block Grant program is administered by the Department's Division of Family and Economic Security, Bureau of Working Families, Program Operations Section. Along with CSBG, the Division of Family and Economic Security administers Temporary Assistance for Needy Families (TANF) program which is known in Wisconsin as the Wisconsin Works program, Transitional Jobs, Refugee Services and Child Support programs. This provides for synergy and coordination of programming to help impoverished families. The Grant Specialist Advanced position provides oversight to the CSBG program based on management experience.

The mission of the Department of Children and Families is to promote the economic and social well-being of Wisconsin's children and families. The Department is committed to protecting children, strengthening families, and building communities.

The Department's five overarching goals are:

1. Children are nurtured, safe and engaged;
2. Enhance prevention and early intervention efforts throughout Wisconsin;
3. Families will have access to quality early care and education;
4. Parents will secure and maintain meaningful jobs; and
5. Fathers will be more engaged in the lives of their children.

Within the Department of Children and Families, CSBG funding is administered by the Program Operations Section. This Section administers the operations of the federally-funded Wisconsin Works program which is dedicated to assisting parents obtain employment to economically support their families. There are additional opportunities for coordination within the Bureau, Division and the Department of Children and Families. These efforts will focus on removing obstacles to families receiving services as they move toward economic self sufficiency.

(b) Goals and Objectives

In keeping with the Department's mission, the Department of Children and Families (DCF) administers the Community Services Block Grant (CSBG) funding from the U.S. Department of Health and Human Services in accordance with the provisions of the

Community Opportunities Accountability, and Training and Education Services Act of 1998, or the "Coats Human Services Reauthorization Act of 1998."

Programs carried out through the State's network of Community Action Agencies (CAAs), Limited Purpose Agencies (LPAs) and tribal nations and bands, and delivered under the authority of the CSBG, are for the purpose of reducing poverty, empowering and revitalizing low-income communities, and empowering low-income families and individuals in urban and rural areas to overcome the effects of poverty and attain self-sufficiency. In Wisconsin, all CSBG activities support one or more of these goals:

1. Strengthen community capabilities for planning and coordinating the use of a broad range of federal, state, local and other resources related to the elimination of poverty, so that programs are responsive to local needs and conditions;
2. Organize a range of services related to the needs of low-income families and individuals, so that these services may have a measurable impact on the causes of poverty in the community and help families and individuals achieve self-sufficiency;
3. Make greater use of innovative and effective, community-based approaches to addressing the causes and effects of poverty;
4. Maximize participation of residents of low-income communities and members of groups served to empower them to respond to the unique problems and needs within their communities;
5. Broaden the resource base of programs directed to the elimination of poverty to secure a more active role in the provision of services for private, faith-based, charitable and neighborhood-based organizations, and individual citizens, and business, labor, and professional groups, who are able to influence the quantity and quality of opportunities and services for the poor.
6. Expand access to effective local and statewide self-sufficiency programs operated by CAAs and LPAs in order to more fully address the needs of low-income persons in the State.
7. Require applicants to clearly demonstrate how low-income, female-headed families, minority populations, children, pregnant adolescents, homeless families, migrants and the elderly poor will be served.
8. Support strengthened case management as an integral part of service delivery. Applicants must also identify how individual and/or family case management will be implemented as an overall agency strategy.
9. Increase statewide participation in an outcome-based performance measurement system through on-going technical assistance and training as necessary to the CAAs, LPAs, the WISCAP and State staff to meet the requirements of Results Oriented Management Accountability (ROMA).
10. Provide funds to LPAs to address the needs of Wisconsin children and families.
11. Provide nutrition, housing, health and other crisis relief for low-income persons in need.
12. Maintain the historical local initiative process requiring CAAs to identify and prioritize local problems and inform that process by conducting a needs assessment of low-income persons in their service areas.
13. Support and enhance CAAs' development of and participation in programs that effectively and efficiently serve low-income individuals.

14. Ensure compliance with all Federal and State regulations and directives through statewide monitoring activities. The Department will continue to monitor CSBG grantees to ensure compliance with all contractual objectives and to assess the effectiveness of local agencies in meeting their stated objectives for ameliorating the causes and affects of poverty in their service area.
15. When increased CSBG funds are provided, expand CSBG funded services statewide to address the population of low-income persons in need who are unserved by CAAs in the State. Then expansion of existing CAAs may be considered a priority instead of creation of new CAAs. In any county of the State not currently served by a CAA, the State may decide to serve an unserved county by:
 - requesting an existing CAA which is located and provides services in a county contiguous to the unserved county to serve the unserved county; or
 - if no existing CAA is located and/or provides services in a county contiguous to the unserved county, a request will be made to the CAA located closest to the unserved county or an existing CAA within reasonable proximity of the unserved county to provide CAA services; or
 - when an existing CAA declines to serve the unserved county, creation of a new CAA shall be possible under Wisconsin Statutes section 49.265(2).

V. The Narrative State Plan: Wisconsin's FFY 2012 Community Services Block Grant (CSBG) Plan
(continued)

(2) Eligible Entities and (3) Distribution and Allocation of Funds

AGENCY	FFY 2012 FUNDING	Counties Served*
Advocap, Inc.	\$322,178	Fond du Lac, Winnebago & Green Lake
CAP Services, Inc.	\$368,650	Portage, Waupaca, Outagamie, Waushara & Marquette
Central Wisconsin Community Action Council, Inc.	\$253,031	Adams, Columbia, Dodge, Juneau & Sauk
Community Action Coalition for South Central Wisconsin, Inc.	\$967,100	Dane, Jefferson & Waukesha
Community Action of Rock and Walworth Counties	\$359,832	Rock, Walworth
Indianhead Community Action Agency	\$184,624	Burnett, Washburn, Sawyer, Rusk, Taylor & Clark
Lakeshore Community Action Program (Lakeshore CAP)	\$229,115	Door, Kewaunee, Manitowoc & Sheboygan
Northeast Wisconsin Community Action Program (NEWCAP)	\$565,238	Brown, Shawano, Oconto, Menominee, Langlade, Oneida, Vilas, Forest, Florence & Marinette
North Central Community Action Program (NCCAP)	\$251,278	Marathon, Wood & Lincoln
Northwest Community Services Agency (Northwest CSA)	\$150,954	Douglas, Bayfield, Ashland, Iron & Price
Racine/Kenosha Community Action Agency	\$489,559	Racine & Kenosha
Community Relations - Social Development Commission	\$2,091,936	Milwaukee
Southwest CAP	\$171,082	Richland, Iowa, Grant, Lafayette & Green
Western Central Community Action Agency (WestCAP)	\$355,761	Chippewa, Dunn, Pepin, Pierce, St. Croix, Polk & Barron
Western Dairyland Economic Opportunity Council	\$236,158	Trempealeau, Buffalo, Eau Claire & Jackson
Couleecap, Inc.	\$284,339	La Crosse, Monroe, Vernon & Crawford
Foundation for Rural Housing	\$102,988	Statewide
Coalition of Wisconsin Aging Groups	\$46,189	Statewide
United Migrant Opportunity Services	\$338,621	Statewide
Tribes	\$338,621	Statewide
TOTAL	\$8,107,254	Direct services to individuals and families

*Of the 72 counties in Wisconsin, 69 have been designated by county governments as "capped" by Community Action Agencies (CAAs), but all counties are currently being served in at least one program area by at least one CAA.

B. Description of Criteria and Distribution Formula

Community Action Agencies (CAAs) will receive 86 percent of the total funding based on a formula derived from the number of persons at or below 100 percent of poverty (per county in the CAA area of service) according to the 2010 census. The formula used is the ratio of the number of persons at 100 percent of poverty in the counties included in the CAA's service area times 86 percent of the total CSBG funding. Following is the formula for the distribution of the CSBG in Wisconsin.

- CAAs - 86%
- Tribal governments - 4%
- United Migrant Opportunity Services - 4%
- Limited Purpose Agencies – 1.8%
- State Administration and WISCAP – 4.2%

Among the requirements for receiving continued funding, each local agency must:

- (1) Submit an annual application outlining its plans for use of these funds. Applications must meet all federal requirements of the Coats Human Services Reauthorization Act of 1998 as well as State of Wisconsin requirements for grantees. Applications are based upon agencies' needs assessments and the 2012 applications will be informed by the required three-year comprehensive assessments for the period of 2009-2010. Applications and needs assessments for the upcoming year are due on October 31 of the preceding year. Applications are reviewed and approved prior to authorizing grant awards.
- (2) Sign a contract agreeing to abide by State and Federal regulations governing grants and human services programs, including federal restrictions on use of CSBG funds. (The State of Wisconsin imposes no additional restrictions on grantees related to the use of CSBG funds.)
- (3) Provide semi-annual program progress reports and an annual report that contain both narratives and quantified updates of progress on ROMA program outcomes.
- (4) File monthly expense reports, and provide monthly board meeting minutes electronically.
- (5) Participate in quarterly roundtable meetings for exchange of information, discussion of new initiatives, program, policy, and administrative issues.
- (6) Host monitoring visits by the Department of Children and Families monitoring personnel.
- (7) Request authority to carry over unexpended CSBG funds to the following year. Agencies make such requests in writing; the CSBG Grant Specialist reviews the requests and discusses them with the agencies as necessary. If approved, the State amends the current year contract and adds the carry over amount to the subsequent grant year. Funds must be expended within the required federal funding period.

No funds will be transferred from the CSBG to other State or federal programs. Wisconsin plans to obligate all funds. Funds allocated for State administration that remain unexpended at the end of a program year will be carried over and used for administration in the subsequent fiscal year. Funds obligated to eligible entities but unexpended at the end of the obligation period will be used by eligible entities in the subsequent fiscal year, consistent with assurances in Sec.675C (2).

- (8) Abide by the federal restrictions on the use of CSBG funds. (Wisconsin imposes no additional restrictions on the use of CSBG funds.)

C. Description of Distribution and Use of Restricted Funds

Wisconsin's 16 regional CAAs and United Migrant Opportunity Services (the statewide organization serving seasonal or migrant farm workers) will receive 90% of Wisconsin's CSBG allocation described as Restricted Funds under 675C(a); these eligible entities and the specific amounts of their allocations are described in the table above (see page 12). Each agency has a unique mix of programs and services that are tailored to meet the needs of low-income individuals, families and households within their service areas. There are nearly 300 programs and services throughout Wisconsin that are in some way supported by the CSBG grant, and that serve the needs of low-income individuals and families who are striving to increase their economic well-being. These include approximately:

- 93 programs in the area of housing offering transitional housing and homeless shelters, home ownership programs, design and development of affordable housing, housing rehabilitation, rent payment assistance, Section 8 housing and lead abatement;
- 25 programs and services in energy assistance and weatherization;
- 42 programs promoting food security and related supports (such as community gardens and nutrition education);
- 26 programs advancing economic and business development, including revolving loan programs, financial literacy education, and tax assistance;
- 49 programs providing employment training, literacy skills, and programs that help participants maximize their earnings through improving their job skills;
- 28 programs promoting family planning, early nutrition, dental care, home health care, and substance abuse and mental health treatment;
- 42 programs offering parental and family support, including child care assistance and referral, parenting classes, domestic abuse intervention and victim support, legal services and clothing assistance;
- 30 programs for youth development, including education skills enhancement, mentoring, violence prevention, independent living skills, and Operation Fresh Start and related programs;
- 12 programs offering transportation services and/or vehicle purchase; and
- 9 programs serving the special needs of seniors.

Though many of these programs are funded in large part by other sources (public, private and earned income), CSBG funds are consistently used by all of Wisconsin's eligible entities for research and development of new programs and services, to supplement the cost of services when funding is insufficient to serve the population in need, and to provide leadership for local and regional collaboratives that are vital to support struggling families and strengthen communities. Consequently, CSBG funds are vital to the effective and efficient operation of all grantees and to the success of the programs described in the following matrix.

In addition to these specific programs, Community Action Agencies (CAAs) and Limited Purpose Agencies (LPAs) play a significant role in organizing, leading and contributing to community collaboratives that strengthen positive outcomes for the individuals and families they serve. These collaborations include those that focus on special populations (such as people who are homeless, low-income elderly, women of reproductive age seeking family planning services, and victims of domestic abuse). Collaborations are also regularly formed and maintained for special projects, such as housing developments, which may include municipalities as well as financial institutions and civic leaders. A list of specific CSBG-supported programs, presented agency-by-agency, is included in the "Community Action Programs & Services" matrix on the following page.

Community Action Programs & Services																			
Program	ADVOCAP	CAP Services	CWCAC	CACSCW, Inc.	CA, Inc.	Coulecap	Indian head	Lakeshore	NEWCAP	North Central	Northwest	R/K CAA	SDC	Southwest	West CAP	WDEOC	CWAG	FRH	UMOS
Education/Skills Enhancement	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆			◆
Adult Literacy Skills	*	*	*		*		*			*		*	*		*				*
Skills Enhancement Program	*	*	*	*	*	*	*	*	*	*	*	*	*		*	*			*
Financial Literacy Education	*		*	*		*		*	*			*	*		*				*
Employment Training	*		*		*	*	*		*	*	*	*	*			*			*
Economic/Business Development	◆	◆	◆	◆		◆	◆		◆			◆		◆		◆			◆
Business Development	*	*	*	*		*	*		*			*		*		*			*
Business Revolving Loan Programs	*	*	*			*	*									*			
Energy	◆	◆	◆	◆	◆	◆	◆		◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	
Emergency Fuel Assistance Programs			*	*		*			*	*	*	*	*	*		*	*	*	
Weatherization Programs	*	*	*		*	*	*		*	*	*	*	*	*	*	*	*	*	
Food Security/Environmental	◆		◆	◆	◆	◆	◆	◆	◆	◆	◆	◆		◆	◆	◆	◆		◆
Emergency Food Assistance	*		*	*	*	*	*	*	*	*	*	*			*	*	-		*
Community Garden Programs	*			*			*		*	*	*	*			*				
Community Meal Prgms/Holiday Baskets	*		*	*	*		*	*	*	*	*	*			*				
Nutrition Education	*		*			*			*		*	*		*	*	*			
Headstart/Child Development	◆	◆					◆	◆				◆		◆		◆			◆
Housing	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆
Transitional Housing/Homeless Shelters	*	*	*	*	*	*	*	*		*	*			*	*	*			*
Rental Property Management/Development	*	*	*		*	*	*	*	*	*	*			*	*				*
Rent Payment Assistance/Section 8	*		*	*		*	*	*	*	*	*	*		*	*			*	
Homeow nership Programs	*	*	*		*	*	*	*	*			*		*	*	*	*		*
Foreclosure Assistance	*				*	*		*	*	*		*			*	*		*	
Lead Abatement			*		*	*						*		*	*				
Housing Revolving Loan Fund	*	*	*		*		*	*	*					*	*	*		*	
Home Repair Programs	*	*	*		*	*	*	*	*				*	*	*	*		*	
Parenting/Family Support	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆
Childcare Care/ Assistance/Referrals		*	*		*			*		*		*	*	*		*			*
Parenting Classes	*	*				*		*				*	*	*					
Clothing Assistance			*	*		*	*			*	*	*		*	*	*			*
Father Initiative		-				*						*	*						*
Violence Prevention/Victim Services	*	*	*				*	*						*			*		
Legal Services							*		*		*			*			*		
Physical/Mental Health		◆	◆		◆	◆	◆		◆		◆	◆	◆	◆		◆	◆		◆
Women's Health					*						◆	*	*	*		*			*
MA/WIC Programs		*				*					*	*		*			*		
AODA/Mental Health		*				*	*						*	*			*		*
Dental Programs		*	*									*	*	*		*			*
Home Healthcare							*												
Refugee/Migrant Services	◆	◆	◆						◆										◆
Senior Services	◆		◆			◆	◆				◆	◆	◆			◆	◆		
Tax Preparation Assistance		◆							◆	◆	◆	◆	◆	◆		◆			◆
Transportation	◆		◆	◆	◆	◆	◆		◆		◆			◆	◆	◆			
Car Purchase Programs	*	*	*	*	*	*			*		*		*	*	*	*			
Youth and Young Adult Services	◆	◆	◆		◆	◆	◆	◆	◆	◆		◆	◆			◆			
Education Skills	*		*			*	*	*	*	*			*						
Fresh Start	*	*	*		*		*									*			
Mentoring Program		*					*	*											
Juvenile Justice/Violence Prevention								*											
Homeless/Runaway Programs		*	*				*		*										

D. Description of Distribution and Use of Discretionary Funds

(1) Support for Tribal nations and bands

Wisconsin provides 4% of its CSBG allocation to its 11 federally-recognized sovereign tribal bands and nations for serving their members and others in need in their communities. These funds are administered in coordination with the Department's Tribal Affairs staff, in concert with the CSBG Grant Specialist, and coordinators of other statewide programs within the Department serving tribal members. The CSBG funds are used in conjunction with resources from other governmental sources to maximize the impact of these investments, and to achieve efficiencies in administration. Each tribe is required to develop a family services plan that addresses the critical elements and requirements of CSBG. The Department approves each plan and works with each tribe to provide any needed technical support. The CSBG Grant Specialist consults regularly with the staff in the Department's Tribal Affairs Office, and meets several times annually with tribal human services staff responsible for administering programs and delivering services. The Department's administration staff provides consultation to tribal leaders in the preparation of tribal services plans and work collaboratively in the allocation of resources.

(2) Support for Limited Purpose Agencies

Wisconsin provides 1.8% of its CSBG allocation to Limited Purpose Agencies (LPAs) (also known as Special Purpose Agencies). For FFY 2012, this funding is dedicated to:

The Foundation for Rural Housing assists low-income families in significant ways. It helps them obtain adequate, safe and sanitary housing and acquire appropriate water and wastewater services. It enables small communities and local organizations to more effectively address the needs of those with substandard shelter.

The Coalition of Wisconsin Aging Groups assists low-income seniors to determine their best option for health and prescription drug benefits.

Funding to LPAs provides an opportunity for the Department to target resources toward groups and/or programs that have a specific focus.

E. Description of Use of Administrative Funds

Wisconsin utilizes 4.2% of the State's CSBG allocation to fund administrative support services that strengthen the work of CAAs and LPAs. While the Department uses the majority of the administrative funds for this purpose, it also supports the work of the Wisconsin Community Action Program Association (WISCAP). This association uses its CSBG funding to coordinate quarterly meetings of agency leadership; to host roundtable discussion sessions in which program and planning staff can discuss issues critical to the success of the State's CSBG-funded programs; and to effectively and efficiently meet the needs of low-income individuals, families and households. These forums are vital exchanges of information, best practices, and ideas for program development and services delivery. With the support of administrative funds, the CSBG Grant Specialist works in consultation and collaboration with WISCAP to:

- (a) Provide training and technical assistance to those entities in need of it;
- (b) Coordinate State-operated programs and services targeted to low-income children and families, with services provided by eligible entities and other organizations funded under this subtitle. This includes (but is not limited to) effective communication with appropriate State and local agencies funded under this subtitle to ensure increased access to services;
- (c) Support statewide coordination and communication among eligible entities;
- (d) Analyze the distribution of funds to ensure they have been targeted to greatest need;
- (e) Support innovative programs and activities conducted by CAAs, LPAs or other neighborhood-based or community-based organizations to eliminate poverty, promote self-sufficiency, and promote community revitalization; and
- (f) Support other activities consistent with the purposes of this subtitle.

Detail: Use of Wisconsin's CSBG Administrative Funds

Wisconsin CSBG Administrative Expenses	
Expense	Amount
Personnel and Fringes (1.25 FTEs)	\$147,056
Travel for Monitoring & TA (Includes 2 out of State conferences, expenses related to travel to agencies for monitoring, board meetings and technical support)	\$8,900
Administrative Support (supplies, rent, printing and postage, Department's services including personnel, IT, accounting and fiscal, insurance, communications, etc.)	
Statewide meetings, memberships and discretionary support for T&TA	\$126,259
Training of State Contract Management Staff	\$3,000
Support of conferences	\$10,000
<u>Subcontracts</u> Training, conferences & TA	\$63,000
Total State Discretionary	\$359,115

Additional funding to the LPAs is included in the over 95% of the State's CSBG funding that goes to CSBG eligible entities through direct contracts.

The personnel portion of the State discretionary funding will be used to support 1.25 full-time equivalents (FTE) within the Department. This includes the Grant Specialist position and portions of other positions that provide for the supervision of and clerical support to the Grant Specialist position.

Other administrative use of the State's CSBG funds include the CSBG Grant Specialist's travel to conduct site visits to each of the CAAs and LPAs, to attend the WISCAP's quarterly Executive Board meetings, and to participate as a member. This budget specifically allocates funds for the grant administrator to participate in National Association for State Community Services Program (NASCSPP) CSBG program trainings.

The Department and its Division of Family and Economic Security will continue to partner with WISCAP to facilitate statewide training, development and technical assistance to the CAAs, conduct quarterly training and best practices roundtables, further implement ROMA, and provide technical assistance to directors and boards as necessary. In FFY 2012, the base contract with WISCAP will be approximately \$98,000, of which \$63,000 will provide training and technical assistance to member CAAs, conduct staff and board of directors training and organizational development, and to increase community supportive services access to low-income households through the emergency food network. Approximately \$10,000 will be allocated to support the annual Poverty Conference. The remaining \$25,000 will fund WISCAP's participation in data collection and analysis as part of the ROMA reporting system. Additional services may be contracted with WISCAP as needed.

F. State Community Services Program Implementation

(1) Program Overview:

(a) The Service Delivery System

Wisconsin's service delivery network is comprised of 16 CAAs, 11 tribal nations and bands, a statewide agency serving seasonal and migrant farm workers, and two limited purpose agencies serving underserved populations in Wisconsin.

At the local level, these agencies work with counties, cities, towns and villages in their service areas to ensure that citizens have access to services that will help them ameliorate the effects of poverty and work toward self-sufficiency. Each services provider also effectively engages the support of local charities, faith communities, civic organizations, businesses, community colleges and technical schools as needed to support effective outcomes for the people it serves.

At the statewide level, the Wisconsin Community Action Program Association (WISCAP) facilitates regular forums for communication and information exchange, and has also served as the catalyst for significant statewide initiatives through organization and advocacy.

The CSBG Grant Specialist works with staff in other programs within the Department, such as Child Care and Child Protective Services, and in other State agencies, (such as the Department of Commerce, Department of Administration, Department of Justice, Department of Health Services, Department of Workforce Development and Department of Public Instruction), to help ensure that the programs and Departments are working in concert and towards shared objectives.

A listing of eligible grantees and a description of the geographical area served was presented above (see page 12).

(b) Linkages

In Wisconsin, CSBG funds are a critical resource for convening and facilitating community-based discussion about local challenges and effective solutions for low-income families. In communities across the State, CAAs host or participate in work groups, coordinated community responses, professional organizations, councils, task forces, civic groups and other forums that actively work towards improved outcomes for people in need. This activity generally results in more effective planning and services delivery and in new program development. In many cases, it may secure more resources, such as donated food, volunteer time, corporate support and even greater community awareness to the problems of low-income individuals and families. Schools, churches, county human services agencies and other recognized community institutions often provide significant sources of referrals to CAAs and rely on their responsiveness to meet the urgent and emergent needs of the families they serve.

All of the CSBG providers in Wisconsin actively engage in outreach strategies. Some agencies have staff on-site at job centers, family resource centers and other locations where people in need can access multiple services more efficiently. CAAs provide in-services and training for referral sources. Most have web sites and provide brochures and program information at key contact sites in their communities. Agencies also actively seek information that would help them more effectively identify and engage families; examples include the use of energy assistance lists by the State's weatherization programs, and the use of food pantries and Head Start programs to recruit low-income board and committee members and engage volunteer support.

(c) Coordination with Other Public and Private Resources

Because the needs of low-income families and households are often complex and greater than the program offerings in any one agency, Wisconsin's established network of CAAs and

LPAs have necessarily developed strong referral relationships with public and private agencies. In some counties, municipal and/or county governments contract with CAAs to provide services. In other counties, CAAs and LPAs are recognized as vitally important service providers in assisting families toward economic stability and self-sufficiency. CSBG funded agencies also effectively access additional Federal and State grant resources including Head Start, weatherization, housing assistance and development, and emergency food services. Agencies also have garnered the ongoing financial support of United Way, community foundations, and other local philanthropic organizations and individuals. In making financial contributions to CAAs, these donors (and the institutions with which they are affiliated) have recognized the effective and reliable role that CAAs and LPAs have in maintaining a safety net for people in need. Community leaders and funders have consistently seen Wisconsin's CSBG-funded agencies produce innovative, cost-effective outcomes that have improved the quality of life in their communities.

(d) Innovative Community and Neighborhood-based Initiatives

In Wisconsin, all CAAs use a portion of their CSBG allocations to research and develop effective solutions to community needs. These solutions continue to include the creation of community health centers and clinics where low-income citizens can access free or low-cost health and dental care. They include the development of a significant number of new and rehabilitated housing units for low income families and seniors and the establishment of earth-friendly community gardens that distribute fresh produce at food pantries where low-income families formerly had little or none. In FFY 2012, Wisconsin agencies will continue these programs, generating successful solutions to community needs. Each agency develops new initiatives based upon the needs of their community.

(2) Community Needs Assessments

Each agency was required to submit their 2010 tri-annual Needs Assessment and Community Action Plan by October 15, 2010. Wisconsin's CSBG-funded agencies have historically and consistently participated in formal needs assessment processes, which include a comprehensive, triennial needs assessment [as described in 676(b)(11)] and annual review and updates of those findings. Needs assessments includes statistical and qualitative data indicating the incidence or prevalence of individual need, and identify gaps in service provision and barriers to attaining self-sufficiency. Individuals completing the needs assessment may also identify individual or community strengths (assets) which could be built upon to address their needs. The needs assessment process seeks input from the same groups that comprise the CAA board, local government, low-income individuals, and the community.

In 2011, the Department is taking steps to ensure that each agency's Needs Assessment and Community Action Plan is representative, accurate and is used for the development of agency programming. The Needs Assessment will:

1. Be comprised of data from a sample size sufficient in number and scope to provide a statistically relevant representation that is geographically diverse to be representative of the impoverished populations through out the agency's entire geographic service area.
2. Include a sample of impoverished in the community that should include at least fifty percent representation attained through information gathered from impoverished community members external to direct surveying of CSBG funded agency clients.
3. Include the action plan elements of this process including:
 - a. Specific recommendations on ways to address the greatest community needs identified in these include information on partnerships, other community services providers that are addressing a specific need, and opportunities to expand or redirect programming.

- b. A connection between this Community Action Plan and the agency strategic planning activities, program development and accountability, and potential uses for CSBG and other funding.

Agencies will use the 2010 Needs Assessment as the basis for strategic planning, development of new initiatives, expanding partnerships, and coordinating programming. The CSBG Grant Specialist will review each of these Needs Assessments and Community Action Plans to ensure a clear relationship between the results of the assessment and the corresponding plans of the agencies. Though specific survey instruments and tools for this process vary by agency, most grantees engage in primary research using written surveys distributed at services locations and by mail. Typically, agencies supplement these findings with information from other community needs assessments, including those conducted by United Way, counties, municipalities, educational institutions and other organizations.

(3) Tripartite Boards

When eligible entities submit their annual applications for funding, they must submit a board listing of the total board positions, number presently filled, board members' names, number of years on the board, ethnicity/race, age estimates, whether their incomes qualify them as low-income members, the agency/group they represent, their terms of office and occupations or professions. If there are vacancies on the board, these positions need to be shown as well, including the type of position and the date of vacancy.

As part of the monitoring process, the CSBG Grant Specialist conducts monitoring visits with the funded agencies. The CSBG Grant Specialist meets either with members of the agency's boards, or with their full boards, and explores a series of questions with them to ensure that they are engaged in the organization, that they understand its operations and that the board meets the tripartite requirements of CSBG. A report is generated as a result of the visit, and if issues arise related to board membership or responsibility, they are addressed both during the review and in the report or in follow-up to those findings. The board chairperson receives a copy of the final report, and in general, reports are shared with board members. Any recommendations or requirements related to a board must comply with procedures outlined below [see G(1)(c)].

Questions addressed with a board during the review include whether it has a full complement of members, whether it had difficulty meeting its quorum requirements for decisions, how it recruits new members, whether it has consistently evaluated the executive director, what kind of reports it receive from staff and in what format, what critical issues are facing the agency, whether a board's by-laws are current, whether a board meets all the federal assurances with respect to board composition and agency oversight, and what the most important agency achievements have been to which this board has made a significant contribution.

The CSBG Grant Specialist reviews board and committee minutes, and when possible, attends board meetings of funded agencies.

(4) State Charity Tax Program

There is no State Charity Tax Program in Wisconsin Statutes.

(5) Programmatic Assurances

Wisconsin will continue to meet the CSBG Programmatic Assurances, as described below.

- (a) Assurance '676(b)(1):** The State of Wisconsin, as required by the CSBG grant, assures that *"Funds made available through the grant or allotment will be used:*
 - (1) To support activities that are designed to assist low-income families and individuals, including families and individuals receiving assistance under part A of Title IV of the Social*

Security Act (42 U.S.C. 601 et seq.), homeless families and individuals, migrant or seasonal farm workers, and elderly low-income individuals and families to enable families and individuals to:

- (i) Remove obstacles and solve problems that block the achievement of self-sufficiency (including self-sufficiency for families and individuals who are attempting to transition off a State program carried out under part A of title IV of the Social Security Act);*
 - (ii) Secure and maintain meaningful employment;*
 - (iii) Attain an adequate education, with particular attention towards improving literacy skills of low-income families in the communities involve, which may include carrying our family literacy initiatives;*
 - (iv) Make better use of available income;*
 - (v) Obtain and maintain adequate housing and a suitable living environment;*
 - (vi) Obtain energy assistance through loans, grants, or other public and private grassroots partnerships with local law enforcement agencies, local public housing authorities, private foundations and other public and private partners to document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts.*
 - (vii) Achieve greater participation in the affairs of the communities involved, including the development of public and private grassroots partnerships with local law enforcement agencies, local housing authorities, private foundations, and other public and private partners to document best practices based on successful grassroots intervention in urban areas, to develop methodologies for widespread replication; and strengthen and improve relationships with local law enforcement agencies, which may include participation in activities such as neighborhood or community policing efforts.*
- (2) To address the needs of youth in low-income communities through youth development programs that support the primary role of the family, give priority to the prevention of youth problems and crime, and promote increased community coordination and collaboration in meeting the needs of youth and support development and expansion of innovative community-based youth development programs that have demonstrated success in preventing or reducing crime, such as programs for the establishment of violence-free zones that would involve youth development and intervention models (such as models involving youth mediation, youth mentoring, life skills training, job creation, and entrepreneurship programs); and after-school child care programs; and*
- (3) To make more effective use of, and coordinate with, other programs (including State welfare reform efforts).*

To meet the assurances in 676(b)(1)(A) through (C), the Wisconsin Bureau of Working Families requires:

1. Submission of annual program plans that form the basis of the agencies' contracts with the State of Wisconsin. The plan must contain the following information:
 - Evidence of participation in the planning process, boards, and programs by low-income persons.
 - The continued analysis of needs and the identification of goals and priority

problems. (The required, three-year needs assessment was conducted in 2010 and forms the foundation for planning for 2010 and beyond.) Information reflects input from low-income persons, public officials, and members of the general community.

- Program objectives that are clear, address the findings in the agency's needs assessment, and include appropriate outcome measures by which programs and services will be evaluated.
- A description of each program's service delivery system in the communities to be served.
- A description of Community Action Agency linkages with service delivery system.
- The complete board summary information.
- A description of the coordination of programs and services.
- Indications that the plan is consistent with CSBG federal and state statute and regulations.
- Measurable program goals that align with the six stated National Goals selected for measure through the Results Oriented Management and Accountability (ROMA) guidelines required by the Office of Community Services.
- Clear evidence of the administrative capability to carry out the requirements of the grant.

This information was also reviewed during an agency monitoring visit during 2010.

2. Annual submission of program progress reports on those plans;
3. Annual submission of demographic and ROMA data describing the number of individuals served by program and the outcomes of those services;
4. Development and implementation of triennial needs assessments and annual updates of those assessments (with prior review of the process design by the Department);
5. Cooperation with and participation in at least a triennial monitoring visit, plans of action in response to findings, recommendations and requirements and follow up to demonstrate those actions were successfully completed;
6. Provision of agency fiscal reports, board meeting agendas and minutes; and
7. Attendance at quarterly WISCAP round table meetings with agency executive directors, agency planners and other staff.

CSBG contracts, plans and programmatic activities are approved and monitored by the Department's CSBG Grants Specialist, with the support of the Program Operations Section, Bureau of Working Families, and Division of Family and Economic Security in the Department.

In 2010, each CAA agency received a fiscal and programmatic monitoring visit. Each of the funded agencies is scheduled to have completed on-site review at least once every three years. Any recommendations or requirements resulting from these visits are receiving appropriate follow-up during the next fiscal year.

(b) Assurance '676(b)(4): *"Eligible entities in the State will provide, on an emergency basis, for the provision of such supplies and services, nutritious foods, and related services, as may be necessary to counteract conditions of starvation and malnutrition among low-income individuals."*

In Wisconsin, 13 of the 16 CAAs and UMOS directly provide emergency food assistance, and counties served by CAAs that do not directly provide emergency food assistance are served by an adjacent CAA. The LPAs makes referrals to providers as necessary and appropriate. As part of the monitoring process, the CSBG Grant Specialist discusses the successes and challenges in the provision of emergency food assistance with the agencies.

In addition, the CSBG Grant Specialist works closely with Wisconsin's administrator of The Emergency Food Assistance Program (TEFAP). When issues arise related to agency responsiveness to problems (such as issues with food storage, attendance at coordinating meetings, staffing problems or other issues) the CSBG Grant Specialist works with the grantees to help ensure that the funded agencies address the identified issues. Finally, WISCAP, the statewide agency membership association, conducts a quarterly roundtable specifically for providers working on food security issues.

- (c) State Assurance ' 676(b)(5):** *"the eligible entities in the State will coordinate and establish linkages between governmental and other social services programs to assure the effective delivery of such services to low-income individuals and to avoid duplication of such services, and that the State and the eligible entities will coordinate provision of employment and training activities in the State and in communities with entities providing activities through statewide and local workforce investment systems under the Workforce Investment Action of 1998."*

Among the local agencies in Wisconsin funded by CSBG, several agency executive directors are active in their regional Workforce Development boards, several have staff stationed at regional Job Centers, and at least one agency has created a community services center in which employment services are co-located with health services and a family resource center.

In addition, the Department of Children and Families contracts with the WISCAP to act as a coordinating body for CSBG-funded activity. WISCAP holds quarterly roundtable meetings by topic, including its Skills Enhancement Roundtable.

Also, the Department is represented on the Governor's Council on Workforce Investment by the Secretary of the Department.

- (d) Assurance '676(b)(6):** *"The State will ensure coordination between antipoverty programs in each community in the State, and ensure, where appropriate, that emergency crisis intervention programs under title XXIV (relating to low-income energy assistance) are conducted in such communities "*

Through the monitoring and reporting mechanism (as describe in (a) above), the CSBG Grant Specialist routinely ensures that there are strong collaborative relationships between funded agencies and other antipoverty organizations in each community. In many cases, a CSBG grantee is also the provider for the Low-income Housing and Emergency Assistance Program (LIHEAP), or may serve as a sub-contactor of county government in one of its service counties in the Wisconsin Home Energy Assistance Program (WHEAP, for heating costs, electric costs, and energy crisis situations to low-income Wisconsin households). CSBG grantees consistently receive referrals from energy assistance providers, have access to the statewide data base listing recipients of energy assistance, and routinely contact those households to offer weatherization services as appropriate.

- (e) Assurance '676(b)(9):** *"The State and eligible entities in the State will, to the maximum extent possible, coordinate programs with and form partnerships with other organizations serving low-income residents of the communities and members of the groups served by the State, including religious organizations, charitable groups and community organizations."*

Through the monitoring process (as described in (a) above), the CSBG Grants Specialist routinely ensures that this coordination occurs. Wisconsin's CSBG monitoring tool and process consists of seven sections; Section III is entitled "Community Connections" and is designed to address this assurance by documenting that these partnerships and collaborations occur.

Agencies commonly work with faith-based organizations, particularly in the areas of emergency food and shelter for homeless individuals and families, with evidence of these connections is documented in the monitoring reports. In addition, it is usual and customary for agencies to have representatives from these organizations on their boards, advisory groups or as agency volunteers, especially in food pantries.

G. Fiscal Controls and Monitoring

(1) State Program Monitoring:

The Department's plan for conducting monitoring reviews of eligible entities, as required under Section 678B(a) of the Act, includes:

(a) *"A full onsite review of each entity at least once during each 3-year period."*

Each CSBG funded agency received a complete fiscal and programmatic monitoring review in 2010.

The programmatic audit completed by the CSBG Grant Specialist focused on program integrity, risk mitigation, organization policies, community connections, human resource administration, ROMA and outcome measurement, strategic visioning and board governance. Each two-day programmatic monitoring review is being conducted by the CSBG Grants Specialist in coordination with Department's fiscal staff.

During the review, the Grant Specialist meets with the executive director, agency's fiscal manager, human resource manager, chairman of the agency's finance committee (or its equivalent), Board of Directors, program managers and other individuals as needed. The agency then receives a draft of the monitor report including a step-by-step review and a summary of the findings. This includes opportunities for growth, recommendations, and requirements (if any) as part of the final report. A copy of that report is provided to both the agency's executive director and board president.

(b) *"An onsite review of each newly designated entity immediately after the completion of the first year in which the entity receives funds through the Community Services Block Grant."*

The State of Wisconsin will have no newly designated funded entities in 2012, but in the event that were to occur, the CSBG Grant Specialist would conduct this required review.

(c) *"Follow-up reviews including prompt return visits to eligible entities, and their programs, that fail to meet the goals, standards and requirements established by the State."*

Once a monitoring report is generated and the final copy is presented to the reviewed agency, the agency has 30 days to respond to recommendations and requirements. An agency's response to recommendations is required, though action on those recommendations is at the discretion of the agency. However, any findings resulting in required action similarly require a response within 30 days, which must outline a plan of action for rectifying the problem and a time line for implementing that action. The CSBG Grant Specialist is responsible for follow-up on both recommendations and

requirements and if necessary, will travel to the agency to ensure such action is appropriately implemented.

- (d) *“Other reviews as appropriate, including reviews of entities with programs that have had other Federal, State or local grants (other than assistance provided under the Community Services Block Grant program) terminated for cause.”*

No such termination of any program in Wisconsin has occurred or is anticipated. However, if such termination were to occur, the CSBG Grant Specialist would work collaboratively with any other appropriate State agencies to conduct a thorough review of the situation and follow with appropriate action.

- (e) *“Specify the date of the last audit conducted and the period covered by the audit for each eligible entity.”*

Most of the funded entities operate on a calendar year, with their audits covering the period of January 1st through December 31st; one agency operates on a July 1st through June 30th fiscal year. To the best of the Department’s knowledge, all agencies have completed, nearly completed or are on track to complete their required audits, and the department is not aware of any issues at this time.

(2) Corrective Action, Termination and Reduction of Funding:

A description of the State’s plan for complying with the requirements of Section 678C of the CSBG Act.

See G(1)(c) above for the description of the process for informing agencies that a change in practice is required (with respect to meeting federal regulations, program performance, or to meet appropriate standards, goals, performance objectives or other actions necessary to comply with federal regulations governing the CSBG program), and the process the State uses to ensure appropriate responsive action.

Whenever possible, the State will give the agency discretion to choose how best to meet a required federal regulation, standard, or program outcome, but it will require that agencies meet all provisions. The State will offer agencies appropriate training and/or technical assistance to effectively address the issue(s).

Agencies will have 60 days to submit a quality improvement plan, and the State will have 30 days to approve the plan or provide the agency with reasons the plan cannot be approved. If an agency is unable or unwilling to submit a plan to undertake responsive action to correct the problem, payments under this program may be withheld until such time as the agency meets the required outcome. (A process for this is outlined in the State’s contracts with the eligible entities.)

As required by the CSBG Act, if an agency fails to meet the requirements of the program and its contract within the specified timeframes, the State, after providing notice to the agency and an opportunity for a hearing, may begin proceedings to reduce funding to the agency or terminate the agency’s status as an eligible entity. The State will submit its determination (and documentation of training and technical assistance provided) to the Secretary of the U.S. Department of Health and Human Services. From the point of submission, the Secretary will make a determination within 90 days, or the State’s determination will become final.

(3) Fiscal Controls, Audits and Withholding:

As required in 678(D)(a) (1) and 678(D)(a)(2), the State uses the 3-year monitoring visit (including on-site fiscal monitoring by an experienced auditor) to ensure that required fiscal control and accounting procedures are in place within funded agencies, and that OMB cost and accounting standards apply. The State requires each agency to submit a copy of its Single Audit (as describe in the CSBG Act) conducted by an independent accounting firm in accordance with generally accepted accounting principles. In addition, the State's expenditure of CSBG funds is itself subject to an annual, independent audit.

(4) Fiscal Assurances

- (a) The assurance '676(b)(7):** The State will cooperate with any federal investigations undertaken in accordance with 676D of the CSBG Act.
- (b) The assurance '676(b)(8):** The State will not terminate or reduce the proportional share of funding (below the proportional share of funded the entity received in the previous fiscal year) unless notice is provided to that entity as well as the opportunity for a hearing on the record. The State understands that such determinations are subject to review by the Secretary of DHHS. The State will carry out this assurance as described above [see G(2) above].
- (d) The assurance '676(b)(10):** The State will ensure that each eligible entity has a petitioning procedure so that low-income individuals, community and religious organizations ask the agency's board of directors for adequate representation on that agency's board. The State uses on-site monitoring visits to determine whether agencies have such a process in place, which must be in writing, in either the board by-laws or in its policy or operations manual. Agencies lacking such a procedure will be asked to develop one and incorporate it into one of the aforementioned documents. The State, through the procedure outlined above [see G(1)(c)], will ensure that the agency complies, or the State will take appropriate action, through the procedures outlined above [see G(2)].

H. Accountability and Reporting Requirements

(1) Results Oriented Management and Accountability

In accordance with Assurance '676(b)(12) of the CSBG Act, the State participates in the Results Oriented Management and Accountability System (ROMA), requiring each eligible and funded agency to identify measurable outcomes for its CSBG-funded programs. The measures meet the following stated National Goals for the Community Services Block Grant Program:

Goal 1: Low-income people become more self-sufficient (self-sufficiency).

Goal 2: The conditions in which low-income people live are improved (community revitalization).

Goal 3: Low-income people own a stake in their community.

Goal 4: Partnerships among supporters and providers of services to low-income people are achieved.

Goal 5: Agencies increase their capacity to achieve results.

Goal 6: Low-income people, especially vulnerable populations, achieve their potential by strengthening family and other supportive systems (family stability).

On March 31, 2012, the State will submit a comprehensive report describing the measurable outcomes for the six National Goals for the Community Services Block Grant Program. Agencies will also submit Applications by October 31, 2011 that will describe projected outcomes.

(2) Annual Report

Under Section 678E(a)(2), the State will continue to provide the required annual report on the measured performance of the State and its eligible entities. This report will include at a minimum information that is pertinent and comprehensive, and which describes in detail CSBG activities and services as well as addresses outcomes which measure how CSBG funds were used to promote self-sufficiency, family stability, and community revitalization.

The following outline will be used to report on CSBG services and activities and outcome measurements for the prior fiscal year:

- (a) Performance Objectives;
- (b) Program Accomplishments and Activities;
- [c] Comparison of Planned and Actual Expenditures for Prior Fiscal Year:
 - (1) Planned Distribution of Funds to Eligible Entities (as shown in previous State plan_ vs. Actual Expenditures (*Note: Recaptured and redistributed funds, if any, will be described.*);
 - (2) Planned Distribution of Funds for Discretionary Purposes (as shown in previous State plan) vs. Actual Expenditures; and
 - (3) Planned Use of Funds for State Administration (as shown in previous State plan) vs. Actual Expenditures;
- (d) Profile of Participants Served (Number and characteristics of clients served);
- (e) Statistical Report on CSBG Program Services:
 - Education;
 - Emergency services;
 - Health;
 - Housing;
 - Income Management;
 - Linkages;
 - Nutrition;
 - Economic Development;
 - Self-sufficiency; and
 - Special/Innovative Programs; and
- (f) Training and Technical Assistance Provided by the State.

Under Section 678E(a)(2), the State will continue to provide the required demographic, fiscal, program and ROMA outcome data as described.

VI. Appendices

A. Documentation of Legislative and Public Hearings

B. Additional Data or Information